

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

**INTERROGATORIES OF
THE DIRECT MARKETING ASSOCIATION, INC.
TO USPS WITNESS VAN-TY-SMITH**

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the Direct Marketing Association, Inc. hereby submits the attached interrogatories to USPS witness Van-Ty-Smith: DMA/USPS-T17, Nos. 1-2. If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,

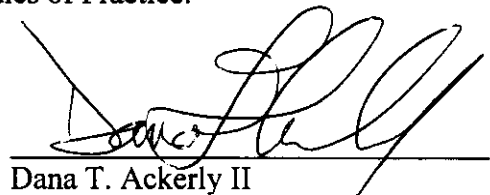


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Counsel for the Direct Marketing
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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Commission's Rules of Practice.



Dana T. Ackerly II

Dated: January 28, 2000

DMA/USPS-T17-1. Please refer to Table 2 (Page 26) of your testimony. Please disaggregate dollar-weighted tally costs by cost pool and by the same categories as in Table 2 (e.g., Direct Tallies - Pieces, Direct Tallies - Items, Direct Tallies - Containers, Mixed Tallies - Uncounted Items). Please provide in an electronic spreadsheet format and in a format similar to Table 2.

DMA/USPS-T17-2. Please refer to Table 3 of your testimony, your library reference LR-H-106, and pages 140-142 of the Docket No. R97-1 Opinion and Recommended Decision. Note that in the Docket No. R97-1 Opinion and Recommended Decision the Postal Rate Commission "conclude[d] that mixed mail costs in a given allied MODS pool should be distributed in proportion to the direct costs across all MODS pools."

a. Did you or anyone else working for the Postal Service (whether as an employee or contractor) perform a distribution of mail processing costs that both distributes mixed-mail tallies in allied operations in the way that the Commission recommended in Docket No. R97-1 and distributes not-handling tallies at allied operations according to the distribution method you are proposing in your testimony?

1. If so, please provide summary results from the method in an electronic spreadsheet format and in a format similar to Table 3 of your testimony.
2. If so, please provide as a library reference all of the programs and data sources you used to implement this distribution method.

b. Did you or anyone else working for the Postal Service (whether as an employee or contractor) perform a distribution of mail processing costs that distributes mixed-mail tallies at allied operations using direct tallies from distribution operations (in addition to direct allied tallies) but in a manner that differs from the Commission's recommendation in Docket No. R97-1?

1. If so, please describe all of these distribution methods.
2. If so, please provide summary results from these distribution methods in an electronic spreadsheet format and in a format similar to Table 3 of your testimony.